

6:20-cv-00260

Exhibit B

6,819,539	T-Mobile's Sale of the Motorola Moto Z2 Force ("The Accused Product")
8. An apparatus comprising: a detection circuit configured to generate a signal having an event condition; and	<p>The accused product utilizes an apparatus comprising: a detection circuit (e.g., a battery monitoring circuit) configured to generate a signal (e.g., voltage or current notification) having an event condition (e.g., if state is high or low).</p> <p>As shown below, the Motorola Moto Z2 Force utilizes a Qualcomm Snapdragon 835 processor.</p>  <p>The screenshot shows a pink header with the T-Mobile logo and navigation links for 'Log in' and 'MENU'. Below the header, the text 'SUPPORT' is visible. The main content area features the heading 'Tech specs: Motorola moto z2 force edition' in white text on a pink background. Below this heading, there is descriptive text about the phone's features, though it is mostly illegible due to the image quality.</p> <p>Learn about the key features and specifications of the Motorola moto z2 force edition.</p>

EXHIBIT B

Specs

- **Battery**
 - Usage time: 10 hours
 - Standby time: 18 hours
 - Battery size/type: 2730 mAh
 - Fast charging type: 15W TurboPower
- **Keyboard**
 - Touch screen with on-screen keyboard
- **Memory**
 - 4 GB RAM, 64 GB ROM
 - Supports 256 MB up to 2 TB MicroSD card
- **Operating System**
 - Android
- **Processor**
 - Qualcomm® Snapdragon™ 835 Octa-Core, MSM 8998
- **Anti-theft**
 - Yes
- **Advanced messaging**
 - Yes
- **Device Unlock App**
 - Yes
- **Emergency Alerts (WEA)**
 - See [T-Mobile.com/WEA](#)
- **SIM card**
 - Nano-SIM
- **System Manager (Carrier IQ)**
 - Yes
- **T-Mobile Video Calling**
 - No - uses Google Duo

<https://www.t-mobile.com/support/devices/android/motorola-moto-z2-force-edition/tech-specs-motorola-moto-z2-force-edition>

As shown below, the Snapdragon 835 includes a battery monitoring circuit that generates a signal based upon the occurrence of a certain condition (in this case voltage variances for normal values).



Snapdragon 835 Mobile Platform

<https://www.qualcomm.com/products/snapdragon-835-mobile-platform>

	<p>Snapdragon 835 mobile platform advancements:</p> <ul style="list-style-type: none">▪ Snapdragon X16 LTE modem: mobile connectivity with LTE download speeds up to 1 Gbps, multi-gigabit 802.11ad, and integrated 2x2 802.11ac Wi-Fi with MU-MIMO▪ Qualcomm® Quick Charge™ 4 technology: 20% faster, 30% more efficient than our previous generation, charge from zero to up to 50% in 15 minutes*▪ Qualcomm® Adreno™ 540 GPU with visual processing subsystem: Advanced 3-D graphics rendering and up to 60X more colors help deliver life-like visuals for immersive experiences*▪ Qualcomm Spectra™ 180 Camera ISP: Dual 14-bit ISPs support up to 32MP single or dual 16MP cameras for the ultimate photography and videography experience▪ Qualcomm® Hexagon™ R82 DSP: Support for latest Machine Learning frameworks and image processing. Includes Hexagon Vector eXtensions and Qualcomm All-Ways Aware™ technology utilizing connectivity and sensors <p>https://www.qualcomm.com/media/documents/files/snapdragon-835-mobile-platform-product-brief.pdf</p>
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```
5006.     qcom,bcl {
5007.         compatible = "qcom,bcl";
5008.         qcom,bcl-enable;
5009.         qcom,bcl-framework-interface;
5010.         qcom,bcl-freq-control-list = <0x1a 0x1b 0x1c 0x1d>;
5011.         qcom,bcl-hotplug-list = <0x1a 0x1b 0x1c 0x1d>;
5012.         qcom,bcl-soc-hotplug-list = <0x1a 0x1b 0x1c 0x1d>;
5013.
5014.         qcom,ibat-monitor {  
5015.             qcom,low-threshold-uamp = <0x33e140>;
5016.             qcom,high-threshold-uamp = <0x401640>;
5017.             qcom,mitigation-freq-khz = <0x8ca00>;
5018.             qcom,vph-high-threshold-uv = <0x3567e0>;
5019.             qcom,vph-low-threshold-uv = <0x325aa0>;
5020.             qcom,soc-low-threshold = <0xa>;
5021.             qcom,thermal-handle = <0xa0>;
5022.         };
5023.     };
```

<https://pastebin.com/U0i7nP4P>

	<pre> 564 bcl->btm_vph_adc_param.btm_ctx = bcl; 565 bcl->btm_vph_adc_param.threshold_notification = bcl_vph_notification; 566 bcl->btm_vph_adc_param.channel = bcl->btm_vph_chan; 1381 bcl->btm_ibat_adc_param.btm_ctx = bcl; 1382 bcl->btm_ibat_adc_param.threshold_notification = bcl_ibat_notification; 1383 bcl->btm_ibat_adc_param.channel = bcl->btm_ibat_chan; </pre> <p>Reports a volatage value</p> <p>Reports a current value</p> <pre> 536 static void bcl_ibat_notification(enum qppnp_tm_state state, void *ctx); 537 static void bcl_vph_notification(enum qppnp_tm_state state, void *ctx); </pre>
a storage circuit configured to store said event;	<p>https://android.googlesource.com/kernel/msm/+refs/heads/android-msm-angler-3.10-nougat/drivers/power/battery_current_limit.c</p> <pre> 707 enum qppnp_tm_state { 708 ADC_TM_HIGH_STATE = 0, 709 ADC_TM_COOL_STATE = ADC_TM_HIGH_STATE, 710 ADC_TM_LOW_STATE, 711 ADC_TM_WARM_STATE = ADC_TM_LOW_STATE, 712 ADC_TM_STATE_NUM, 713 }; </pre> <p>https://android.googlesource.com/kernel/msm/+refs/heads/android-msm-asus-3.10-nougat-mr1-wear-release/include/linux/qppnp/qppnp-adc.h</p> <p>The accused product comprises a storage circuit (e.g., L2 cache) configured to store said event (e.g., if state is high or low).</p> <p>As shown below, the Snapdragon 835 includes an L2 cache that stores voltage variance events.</p>

	 <p>Performance</p> <p>Up to 2.45GHz 2MB L2</p> <p>20% performance uplift over range of use cases such as app load time, web browsing, VR</p> <p>Efficiency</p> <p>1.8GHz 1MB L2</p> <p>80% of time is spent on efficiency cluster</p> <p>Minimized memory transaction power with larger L2 cache</p> <p>https://www.androidauthority.com/qualcomm-details-snapdragon-835-735688/</p>
a table configured to store a plurality of event types; and	<p>The accused product comprises a table (e.g., a table containing various thresholds) configured to store a plurality of event types (e.g., if state is high or low).</p> <p>As shown in the code below, the Snapdragon 835 utilizes a table that defines various voltage conditions and their table corresponding thresholds.</p>

```
5006.         qcom,bcl {
5007.             compatible = "qcom,bcl";
5008.             qcom,bcl-enable;
5009.             qcom,bcl-framework-interface;
5010.             qcom,bcl-freq-control-list = <0x1a 0x1b 0x1c 0x1d>;
5011.             qcom,bcl-hotplug-list = <0x1a 0x1b 0x1c 0x1d>;
5012.             qcom,bcl-soc-hotplug-list = <0x1a 0x1b 0x1c 0x1d>;
5013.
5014.             qcom,ibat-monitor {  
5015.                 qcom,low-threshold-uamp = <0x33e140>;
5016.                 qcom,high-threshold-uamp = <0x401640>;
5017.                 qcom,mitigation-freq-khz = <0x8ca00>;
5018.                 qcom,vph-high-threshold-uv = <0x3567e0>;
5019.                 qcom,vph-low-threshold-uv = <0x325aa0>;
5020.                 qcom,soc-low-threshold = <0xa>;
5021.                 qcom,thermal-handle = <0xa0>;
5022.             };
5023. }
```

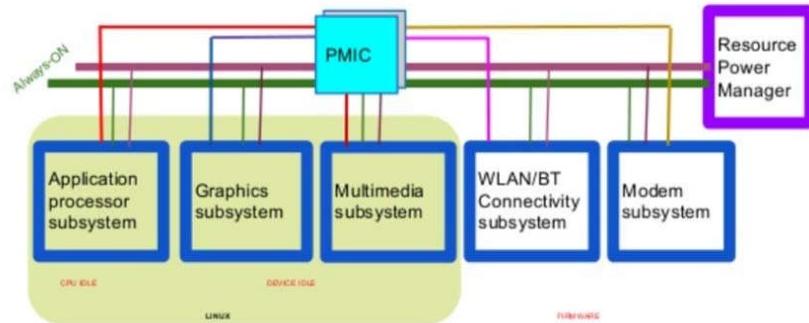
<https://pastebin.com/U0i7nP4P>

	<pre> 5014. qcom,ibat-monitor { 5015. qcom,low-threshold-uamp = <0x33e140>; 5016. qcom,high-threshold-uamp = <0x401640>; 5017. qcom,mitigation-freq-khz = <0x8ca00>; 5018. qcom,vph-high-threshold-uv = <0x3567e0>; 5019. qcom,vph-low-threshold-uv = <0x325aa0>; 5020. qcom,soc-low-threshold = <0xa>; 5021. qcom,thermal-handle = <0xa0>; 5022. }; 5023. }; -----</pre> <p>https://pastebin.com/U0i7nP4P</p>
a circuit configured to (i) reset when said event condition is a first predetermined type and (ii) implement recover action when said event condition is a second predetermined type, wherein said first and second predetermined types are determined in response to a comparison of said event to said plurality of event types stored in said table .	The accused product comprises a circuit (e.g., resource power manager circuit) configured to (i) reset (e.g., <code>cpu_down</code>) when said event condition is a first predetermined type (e.g., when <code>bcl_soc_state == BCL_LOW_THRESHOLD</code> OR <code>bcl_vph_state == BCL_LOW_THRESHOLD</code>) and (ii) implement recover action (e.g., <code>cpu_up</code>) when said event condition is a second predetermined type (e.g., when <code>bcl_soc_state</code> is not equal to <code>BCL_LOW_THRESHOLD</code> , <code>bcl_vph_state</code> is not equal to <code>BCL_LOW_THRESHOLD</code> and <code>bcl_ibat_state</code> is not equal to <code>BCL_HIGH_THRESHOLD</code>), wherein said first and second predetermined types are determined in response to a comparison of said event to said plurality of event types stored in said table (e.g. the comparison of collected values with stored thresholds).

4 Resource Power Manager (RPM)

5
6 RPM is a dedicated hardware engine for managing shared SoC resources,
7 which includes buses, clocks, power rails, etc. The goal of RPM is
8 to achieve the maximum power savings while satisfying the SoC's
9 operational and performance requirements. RPM accepts resource
10 requests from multiple RPM masters. It arbitrates and aggregates the
11 requests, and configures the shared resources. The RPM masters are
12 the application processor, the modem processor, as well as some
13 hardware accelerators.

https://android.googlesource.com/kernel/msm/+/android-7.1.0_r0.2/Documentation/arm/msm/rpm.txt



<https://www.slideshare.net/linaroorg/lcu14-210-qualcomm-snapdragon-power-management-unique-challenges-for-power-frameworks>

```

213 #ifdef CONFIG_SMP
214 static void __ref bcl_handle_hotplug(struct work_struct *work)
215 {
216     int ret = 0, _cpu = 0;
217
218     mutex_lock(&bcl_hotplug_mutex);
219     if (cpumask_empty(bcl_cpu_online_mask))
220         bcl_update_online_mask();
221
222     if (bcl_soc_state == BCL_LOW_THRESHOLD
223         || bcl_vph_state == BCL_LOW_THRESHOLD)
224         bcl_hotplug_request = bcl_soc_hotplug_mask;
225     else if (bcl_ibat_state == BCL_HIGH_THRESHOLD)
226         bcl_hotplug_request = bcl_hotplug_mask;
227     else
228         bcl_hotplug_request = 0;
229
230     for_each_possible_cpu(_cpu) {
231         if (!(bcl_hotplug_mask & BIT(_cpu))
232             && !(bcl_soc_hotplug_mask & BIT(_cpu)))
233             || !(cpumask_test_cpu(_cpu, bcl_cpu_online_mask)))
234             continue;
235
236         if (bcl_hotplug_request & BIT(_cpu)) {
237             if (!cpu_online(_cpu))
238                 continue;
239             ret = cpu_down(_cpu);
240             if (ret)

```

Event condition is a first predetermined type

Reset

https://android.googlesource.com/kernel/msm/+refs/heads/android-msm-angler-3.10-nougat/drivers/power/battery_current_limit.c

```
114 static void __ref bcl_handle_hotplug(struct work_struct *work)
115 {
116     int ret = 0, _cpu = 0;
117
118     mutex_lock(&bcl_hotplug_mutex);
119     if (!cpumask_empty(bcl_cpu_online_mask))
120         bcl_update_online_mask();
121
122     if (bcl_soc_state == BCL_LOW_THRESHOLD
123         || bcl_vph_state == BCL_LOW_THRESHOLD)
124         bcl_hotplug_request = bcl_soc_hotplug_mask;
125     else if (bcl_ibat_state == BCL_HIGH_THRESHOLD)
126         bcl_hotplug_request = bcl_hotplug_mask;
127     else
128         bcl_hotplug_request = 0; Event condition  
second predicate  
type
129
130     for_each_possible_cpu(_cpu) {
131         if (!(bcl_hotplug_mask & BIT(_cpu))
132             && !(bcl_soc_hotplug_mask & BIT(_cpu)))
133             || !cpumask_test_cpu(_cpu, bcl_cpu_online_mask))
134             continue;
135
136         if (bcl_hotplug_request & BIT(_cpu)) {
137             if (!cpu_online(_cpu))
138                 continue;
139             ret = cpu_down(_cpu);
140             if (ret)
141                 pr_err("Error %d offline core %d\n",
142                         ret, _cpu);
143             else
144                 pr_debug("Set Offline CPU:%d\n", _cpu);
145         } Event condition  
predetermined else {
146             if (!cpu_online(_cpu))
147                 continue;
148             ret = cpu_up(_cpu); Recover
149             if (ret)
```

https://android.googlesource.com/kernel/msm/+/refs/heads/android-msm-angler-3.10-nougat/drivers/power/battery_current_limit.c

```
5014.         qcom,ibat-monitor {
5015.             qcom,low-threshold-uamp = <0x33e140>;
5016.             qcom,high-threshold-uamp = <0x401640>;
5017.             qcom,mitigation-freq-khz = <0x8ca00>;
5018.             qcom,vph-high-threshold-uv = <0x3567e0>;
5019.             qcom,vph-low-threshold-uv = <0x325aa0>;
5020.             qcom,soc-low-threshold = <0xa>;
5021.             qcom,thermal-handle = <0xa0>;
5022.         };
5023.     };
```

<https://pastebin.com/U0i7nP4P>

Threshold Values from the table (dtsi) are imported into the battery_current_limit module thru a record data type (bcl).

```

1519
1520     BCL_FETCH_DT_U32(ibat_node, key, "qcom,low-threshold-uamp", ret,
1521                         bcl->ibat_low_thresh.trip_value, ibat_probe_exit);
1522     BCL_FETCH_DT_U32(ibat_node, key, "qcom,high-threshold-uamp", ret,
1523                         bcl->ibat_high_thresh.trip_value, ibat_probe_exit);
1524     BCL_FETCH_DT_U32(ibat_node, key, "qcom,mitigation-freq-khz", ret,
1525                         bcl->bcl_p_freq_max, ibat_probe_exit);
1526     BCL_FETCH_DT_U32(ibat_node, key, "qcom,vph-high-threshold-uv", ret,
1527                         bcl->vbat_high_thresh.trip_value, ibat_probe_exit);
1528     BCL_FETCH_DT_U32(ibat_node, key, "qcom,vph-low-threshold-uv", ret,
1529                         bcl->vbat_low_thresh.trip_value, ibat_probe_exit);
1530     BCL_FETCH_DT_U32(ibat_node, key, "qcom,soc-low-threshold", ret,
1531                         soc_low_threshold, ibat_probe_exit);

```

The values of the table are now inside the record, bcl. The State of Charge low threshold is saved in a variable soc_low_threshold.

```

174     /* BCL Peripheral monitor parameters */
175     struct bcl_threshold ibat_high_thresh;
176     struct bcl_threshold ibat_low_thresh;
177     struct bcl_threshold vbat_high_thresh;
178     struct bcl_threshold vbat_low_thresh;
179     uint32_t bcl_p_freq_max;
180 };

```

Different possible event types

https://android.googlesource.com/kernel/msm/+refs/heads/android-msm-angler-3.10-nougat/drivers/power/battery_current_limit.c

```
17 #define BCL_NAME_MAX_LEN 20
18
19 enum bcl_trip_type {
20     BCL_HIGH_TRIP,
21     BCL_LOW_TRIP,
22     BCL_TRIP_MAX,
23 };
```

https://android.googlesource.com/kernel/msm/+refs/heads/android-msm-angler-3.10-nougat/include/linux/msm_bcl.h

```
31 struct bcl_threshold {
32     int trip_value;
33     enum bcl_trip_type type;
34     void *trip_data;
35     void (*trip_notify)(enum bcl_trip_type, int, void *);
36 };
```

```

214 static void __ref bcl_handle_hotplug(struct work_struct *work)
215 {
216     int ret = 0, _cpu = 0;
217
218     mutex_lock(&bcl_hotplug_mutex);
219     if (cpumask_empty(bcl_cpu_online_mask))
220         bcl_update_online_mask();
221
222     if (bcl_soc_state == BCL_LOW_THRESHOLD
223         || bcl_vph_state == BCL_LOW_THRESHOLD)
224         bcl_hotplug_request = bcl_soc_hotplug_mask; First event
225     else if (bcl_ibat_state == BCL_HIGH_THRESHOLD)
226         bcl_hotplug_request = bcl_hotplug_mask;
227     else Second event
228         bcl_hotplug_request = 0;
229
230     for_each_possible_cpu(_cpu) {
231         if (!(bcl_hotplug_mask & BIT(_cpu))
232             && !(bcl_soc_hotplug_mask & BIT(_cpu)))
233             || !(cpumask_test_cpu(_cpu, bcl_cpu_online_mask)))
234             continue;
235
236         if (bcl_hotplug_request & BIT(_cpu)) {
237             if (!cpu_online(_cpu))
238                 continue;
239             ret = cpu_down(_cpu);
https://android.googlesource.com/kernel/msm/+refs/heads/android-msm-angler-3.10-nougat/drivers/power/battery\_current\_limit.c

```

The new values of bcl_vph_state and bcl_ibat_state are compared against the threshold values from the table.

